

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-00452-FL-1

UNITED STATES OF AMERICA)	
)	
v.)	MOTION FOR EXTENSION OF TIME
)	
LEONID ISAAKOVICH TEYF)	

Defendant respectfully moves to extend the time for filing additional proposed jury instructions and *voir dire* questions from February 3, 2020 through and including March 9, 2020. In support of this motion, Defendant shows the following:

1 Defendant is prepared to and will file the majority of his proposed jury instructions and *voir dire* questions on February 3rd but additional time is needed to file supplemental defense related requests as continued investigation and preparation remains ongoing, including but not limited to the taking of testimony of several additional Rule 15 foreign trial witnesses, all of which is necessary for the determination and submission of specific proposed jury instructions.

2. Local Criminal Rule 24.1 provides for such submissions to be made 7 days before the commencement of trial, presently scheduled for March 16, 2020.

3. Additionally, as this Court is aware, circumstances dependent on the presentation of sufficient admissible evidence by the Government in its case-in-chief and potential failure to satisfy its burden of proof, are relevant to the determination of which defense related jury instructions, if any, may then be justified or be requested. Consistent

with the foregoing and as the defense bears no burden of proof, the submission of all defense related jury instructions six weeks before trial presents, in effect, a burden on the defendant that he is otherwise currently not prepared to identify, articulate or present.

WHEREFORE, Defendant respectfully requests that this Motion be granted, and that Defendant's deadline for supplemental proposing jury instructions and *voir dire* questions be extended through and including March 9, 2020.

This the 3rd day of February, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2020, I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME** and proposed **ORDER** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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